



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

March 14, 2022

BY ECF

The Honorable Lorna G. Schofield
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. Eric Lira*, 22 Cr. 151

Dear Judge Schofield:

The Government and counsel for defendant Eric Lira respectfully write in response to the Court's March 10, 2022 order, (ECF No. 8), directing the parties to confer and submit a joint letter to the Court proposing a schedule for discovery, the filing of any pretrial motions, and three proposed dates for a status conference thereafter.

The Government is prepared to produce an initial round of discovery to defense counsel upon execution of a protective order governing the dissemination of discovery in this matter.¹ In light of evidence the Government obtained upon the defendant's arrest on January 11, 2022, to include electronically stored information ("ESI"), the Government anticipates producing discovery to defense counsel on a rolling basis in the coming weeks, and completing its production of discovery on May 27, 2022. The defense has no objection to the proposed discovery deadline.

With respect to the submission of pretrial motions, the parties respectfully request that any initial briefs be filed by July 27, 2022; any response by August 26, 2022; and any reply by September 9, 2022.

The parties further propose that the Court schedule a pretrial conference on any of the following three dates: October 7, 11, or 12, 2022.

[Continued]

¹ The parties are currently in discussions regarding the language of the proposed protective order. The Government is hopeful that the parties will reach agreement on proposed language for the Court's consideration.

The Government further requests that the Court exclude time between the filing of this letter and the next scheduled pretrial conference, pursuant to the Speedy Trial Act. 18 U.S.C. § 3161. Exclusion of time will facilitate the defense's review of discovery and the parties' litigation of pretrial motions; consequently, the "ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial." 18 U.S.C. § 3161(h)(7).

Respectfully submitted,

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Cc: Mary Stillinger, Esq. (via ECF)